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February 3, 2021

Via ECF Filing

Honorable Jesse M. Furman
Thurgood Marshall
U.S. District Court – SDNY
40 Foley Square, Courtroom 1105
New York, New York 10007

Re: Altaune Brown v. ABA Locksmith & Keys Inc and NMGJ LLC
NY Southern District Court, Case No.: 1:20-cv-10580-JMF

Dear Honorable Jesse M. Furman:

We the attorneys for the Defendant NMGJ LLC (“Defendant”) in the above referenced matter and are submitting this letter motion requesting an adjournment of the initial pretrial conference scheduled on March 25, 2021.

The complaint (ECF No. 1) was served upon the Defendant via the Secretary of State of the State of New York on December 28, 2020 (ECF No. 7). Our firm was retained by the Defendant yesterday and accordingly filed a notice of appearance (ECF No. 15).

We have reached out to the Plaintiff’s counsel who has agreed to extend Defendant’s time to answer Plaintiff’s complaint by 30 days to March 4, 2021. Plaintiff and Defendant have begun a preliminary settlement discussion and intend to diligently pursue the same before the initial pretrial conference.

Since our firm has just been retained and will need some time to become familiar with the instant litigation and to pursue a meaningful settlement discussion with the plaintiff, we respectfully request the court for an order to adjourn the initial pretrial conference scheduled on March 25, 2021 to May 25, 2021, or at such other dates that the court deems as appropriate.

This is the first request for an adjournment/extension from the Defendant. Counsel for Plaintiff agrees that this letter shall be deemed as a joint letter from both sides.

Very truly yours,

/s/ Robert W. Wong

Robert W. Wong

cc. Bradley G. Mark, attorney for Plaintiff

Defendant NMJ LLC's request to extend the deadline to answer or otherwise respond to the complaint is GRANTED. NMJ's request to adjourn the initial pretrial conference on March 25, 2021 is DENIED. The parties shall follow with the procedures described in the Court's order of December 16, 2020, including filing a joint letter and proposed case management plan the Thursday prior to the conference and scheduling a mediation with the Court-annexed mediation program at least two weeks prior to the initial pretrial conference. The Clerk of Court is directed to terminate ECF No. 17. SO ORDERED.

A handwritten signature in black ink, appearing to read "J. Mark", is written over the text "SO ORDERED".

February 4, 2021